REMARKS

STATUS OF THE CLAIMS

In accordance with the foregoing, claims 1, 56 and 63 have been amended. Claims 1-63 are pending and under consideration.

No new matter is being presented, and approval of the amended claims is respectfully requested.

REASONS FOR ENTRY

Applicant requests entry of this Rule 116 Response and Request for Reconsideration because the amendments to the independent claims are merely to further clarify certain features of the present invention. Applicant believed in good faith that the cited prior art did not disclose the present invention as previously claimed.

The amendments do not significantly alter the scope of the claims and place the application at least into a better form for appeal. The Manual of Patent Examining Procedures sets forth in §714.12 that "[a]ny amendment that would place the case either in condition for allowance or in better form for appeal may be entered." (Underlining added for emphasis) Moreover, §714.13 sets forth that "[t]he Proposed Amendment should be given sufficient consideration to determine whether the claims are in condition for allowance and/or whether the issues on appeal are simplified." The Manual of Patent Examining Procedures further articulates that the reason for any non-entry should be explained expressly in the Advisory Action.

REJECTIONS OF CLAIMS 1-62 FOR OBVIOUSNESS UNDER 35 USC §103(a) AS BEING UNPATENTABLE OVER HSU ET AL. (U.S. PATENT NO. 6,377,956 B1) IN VIEW OF WORLD WIDE WEB CONSORTIUM, *XML SCHEMA PART I: STRUCTURES*, W3C WORKING DRAFT (MAY 6, 1999) AND FURTHER IN VIEW OF SATO ET AL. (U.S. PATENT NO. 6,014,680)

The rejections of claims 1-62 are respectfully traversed and reconsideration is requested.

The cited portion of *XML Schema Part I* discusses, "[e]xternal parsed entities are a feature of XML that offers a method for including well-informed XML document fragments, including text and markup, by direct reference to the storage object of the parsed entity." In other words, this portion of *XML Schema Part I* merely provides a method of incorporating sub-

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documents or document fragments into a single document by simply referencing the storage location of the sub-documents.

In contrast, embodiments of the present invention are characterized by *automatically* adding entity declarations to the hub document *responsive to the presence of the structured documents in the structured document file-system directory.* That is, embodiments of the present invention are capable of determining the presence of a structured document, which is formed by converting the non-structured documents stored in the original document file-system directory into structured documents and storing the structured documents into the structured document file-system directory, and automatically adding entity declarations of the hub document when such a structured document exists.

However, in the Response to Arguments (B), on page 11 of the Action, the Examiner maintains that *XML Schema Part I* teaches automatically adding the entity declarations to the hub document responsive to the presence of the structured documents in the structured document file-system directory by acquiring document names of the structured documents stored in the structured document file-system directory and preparing corresponding entity declarations referring to the structured documents, as recited in independent claim 1, for example, citing section 3.6.2, on page 38.

Further, in the rejection of independent claim 1 on page 5 of the Action, the Examiner states that the aforementioned feature of independent claim 1 reads on *XML Schema Part I* since *XML Schema Part I* depicts a hub document referencing the storage location of sub-documents.

However, *XML Schema Part I* does not discuss whether its document fragments are grouped together automatically, responsive to the presence of such document fragments. To the contrary, it appears in the example provided in section 3.6.2, on page 39 of *XML Schema Part I*, that a user may be forced to manually declare the external parsed entities, as well as their storage objects.

Therefore, it is respectfully submitted that the prior art fails to teach or even suggest automatically adding the entity declarations to the hub document responsive to the presence of the structured documents in the structured document file-system directory, as recited in independent claims 1 and 56. Accordingly, an advantage of embodiments of the present invention is that the hub document can be prepared rapidly and readily, and the operation burden to the preparing person is light (see page 10, lines 9-12, of the present specification).

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For further clarification, independent claims 1 and 56 are amended herein to further clarify that the method and apparatus, according to embodiments of the present invention, are capable of determining whether each of the plurality of structured documents is present in the structured document file-system directory; and in response to the presence of each of the plurality of structured documents in the structured document file-system directory, automatically adding the entity declarations to the hub document.

Accordingly, the rejections of amended independent claims 1 and 56 are respectfully traversed. Dependent claims 2-55 depend from claim 1, and claims 57-62 depend from claim 56. Dependent claims 2-55 and 57-62 inherit the recitations of their respective base claim and, thus, it is respectfully submitted that claims 2-55 and 57-62 also patentably distinguish over the prior art.

REJECTION OF CLAIM 63 FOR OBVIOUSNESS UNDER 35 USC §103(A) AS BEING UNPATENTABLE SATO ET AL. (U.S. PATENT NO. 6,014,680) IN VIEW OF WORLD WIDE WEB CONSORTIUM, XML SCHEMA PART I: STRUCTURES, W3C WORKING DRAFT (MAY 6, 1999)

On pages 8-10 of the Action, independent claim 63 is rejected as being unpatentable over Sato et al. in view of *XML Schema Part I*, for reasons similar to those discussed above for independent claims 1 and 56. However, the deficiencies of *XML Schema Part I*, discussed above, are also apparent in the rejection of amended independent claim 63. It is further submitted that Sato et al. fails to cure the deficiencies of *XML Schema Part I*, discussed above

Thus, for at least the reasons provided above, the rejection of amended independent claim 63 is also respectfully traversed.

INFORMATION DISCLOSURE STATEMENT

An Information Disclosure Statement was filed October 25, 2006. Consideration and acknowledgement of the references cited therein are respectfully requested.

CONCLUSION

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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